



October 19, 2009

Ms. Catherine Reheis-Boyd
Chair, Blue Ribbon Task Force
Marine Life Protection Act Initiative
c/o California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

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RESOURCES AGENCY OF CA

Dear Ms. Reheis-Boyd:

We were pleased to read the letter from Mr. Russell Galipeau, Superintendent of the National Park Service (NPS), Channel Islands National Park, regarding our short video titled, "The Case for Adaptive Management in Marine Reserves." As you will recall our video argued that simply presuming historical predators will emerge within marine reserves to prevent an over-abundant sea urchin population creating an urchin barrens is naive and dangerous.

We are pleased to read that the NPS agrees with us that the effect reserves will have on the urchin - kelp relationship is not known or appropriately understood. Ostensibly they would also agree that comprehensive monitoring and easily implemented adaptive management is critical to realize the promise of reserves and protect marine resources - two elements lacking at the Channel Islands reserves and the MPAs adopted under the Marine Life Protection Act (MLPA).

We are troubled, however, by the NPS suggestion that kelp returned to the Hare Rock monitoring area at San Miguel Island only after the reserve was established and sea urchin harvesting was terminated. They make no suggestion for how this could be possible (e.g., a major influx of urchin predators). Are we to assume there is no relationship between sea urchin densities and kelp abundance - a claim completely at odds with all recognized science and the work of conservation groups removing sea urchin as part of their efforts to restore local kelp.

The NPS reports that for 23 years prior to designating a reserve and terminating sea urchin harvesting the area was an urchin barrens and suddenly when urchin harvesting stopped sea urchin numbers plummeted and kelp blossomed. Clearly something complex is going on and limited NPS monitoring does not contribute to our understanding of what that may be.

Reserve proponents like to argue, as the NPS does, that reserves in which fishing is prohibited will allow natural processes to prevail. Their letter critiquing our video raises lots of questions challenging that simplistic assumption. The way reserves are being implemented currently addresses only one variable (e.g., fishing) in a complex ecosystem. The NPS charges the Sea Urchin Commission with taking a "very narrow snapshot" to draw broad conclusions - I suggest we are not the only ones.

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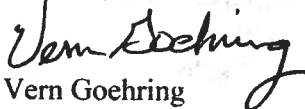
Limited management and monitoring ignores potentially critical ecosystem variables and unintended consequences of reserves. Numerous human caused activities could easily offset hoped for benefits of fishing restrictions, but not monitoring for those effects will prevent adaptive management changes. Likewise there is no monitoring of the potential for bacterial, taxonomic, or parasitic consequences resulting from reserves. Unnatural population densities within an ecosystem impacted by numerous environmental stressors could lead to widespread biological threats (according to the NPS something other than harvesting or predators lead to a declining red sea urchin population starting in 2003 at San Miguel Island).

We have seen the reports of the first five year results of the Channel Islands reserves: that fished species are more numerous and bigger within reserves and that reserves contain more biomass. Elementary conclusions at best. Any beginning science student could predict that if fishing is stopped the number and size of fish will increase, a result that can easily be attained through traditional fishery management without the draconian affect of 'no-take' reserves. One missing element in creating and monitoring reserves is an initial estimate of ecosystem changes to be expected so that outcomes can accurately and truthfully be evaluated.

Again we welcome this focus on the critical need for comprehensive monitoring leading to adaptive management of MPAs to ensure conservation benefits while avoiding unintended resource or economic consequences. We urge the Blue Ribbon Task Force to incorporate appropriate terms and conditions, as part of its recommendation for Southern California MPAs, to ensure meaningful monitoring and adaptive management.

Thank you for your attention to this matter. The California Sea Urchin Commission is ready to assist you.

Sincerely,



Vern Goehring
Executive Director

cc: Dr. Steven Murray, Science Advisory Team, MLPAI
Mr. Russell E. Galipeau, Superintendent, Channel Islands National Park
Mr. John Carlson, Executive Director, CA Fish & Game Commission
CA Fish & Game Commission members